

## **Deficiency Progress Report**

To complete the evaluation process, CUPAs submit Deficiency Progress Reports to Cal/EPA that explain their progress towards correcting the identified deficiencies. Deficiency Progress Reports are due every 90 days after the evaluation date until all deficiencies have been corrected.

**CUPA:** Sonoma County Department of Emergency Services  
**Evaluation Date:** April 24 and 25, 2007  
**Evaluators:** JoAnn Jaschke, CalEPA  
Mickey Pierce, DTSC  
Jack Harrah, OES  
Sean Farrow, SWRCB

**Date update 1 was submitted:** July 23, 2007

**Deficiencies corrected with update 1:** Deficiencies 1, 2, 3, and 5

**Date update 2 was submitted:** October 19, 2007

**Deficiencies corrected with update 2:** Deficiencies 4 and 7

**Date update 3 was submitted:** January 22, 2008

**Deficiency correct with update 3:** Deficiency 6

**6. Deficiency:** The CUPA is not ensuring that all UST facilities have current financial responsibility forms.

**Preliminary Corrective Action(s):** By October 24, 2007, the CUPA will go through its files and identify those facilities with out-dated financial responsibility forms and require the submittal of new forms.

**CUPA Corrective Action, (Update 1):** Through its CUPA DMS database, DES is now tracking the dates of the latest Statements of Financial Responsibility for its UST sites. Currently, this information has been gathered for 57% of them. DES expects that by 10/24/07, it will have identified all sites with out-dated financial responsibility forms and required submittal of new forms.

**Cal/EPA and SWRCB Response:** SWRCB feels the CUPA is making good progress towards correcting this deficiency. In the next deficiency progress report, please update Cal/EPA on the status of correcting this deficiency.

**CUPA Corrective Action, (Update 2):** Information on Statements of Financial Responsibility has now been gathered for all of the CUPA's 95 UST sites and entered into the CUPA DMS database. 71 of those sites (74.7%) have current Statements on file. The remaining 24 were contacted and were required to submit current Statements within 30 days (by November 19, 2007).

**Cal/EPA and SWRCB Response:** SWRCB feels the CUPA is making good progress towards correcting this deficiency. In the next deficiency progress report, please update Cal/EPA on the status of correcting this deficiency.

**CUPA Corrective Action, (Update 3):** The CUPA currently has 91 active UST sites. Of these, 86 (94.5%) have filed current Statements of Financial Responsibility. The remaining five have been issued Notices of Violation and notified they may face civil penalties of \$500 to \$5,000 per day of violation. Their responses are due by the end of February 2008 at the latest.

**Cal/EPA and SWRCB Response:** The CUPA has corrected this deficiency.